BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268–0001

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

MAILING ONLINE EXPERIMENT

Docket No. MC2000-2

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF
THE OFFICE OF THE CONSUMER ADVOCATE
REDIRECTED FROM WITNESS POELLNITZ
(December 30, 1999)

The United States Postal Service hereby provides the response of witness Garvey to the following interrogatory of the Office of the Consumer Advocate: OCA/USPS-T2-4, filed on December 20, 1999 and redirected from witness Poellnitz.

The interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

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Kenneth N. Hollies

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–3083 Fax –5402 December 30, 1999

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS GARVEY TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE REDIRECTED FROM WITNESS POELLNITZ

OCA/USPS-T2-4. Please supply the estimates of advertising expenditures provided by the Postal Service's Internet Business Group in as much detail as possible, and discuss in detail how the planned expenditures for advertising will achieve the volumes for MOL service projected by witness Rothschild.

RESPONSE:

The advertising budget provided to witness Poellnitz was and still is the best estimate available at the time. The Mailing online portion of the Internet Business Group's total advertising budget was simply derived from the previous PostOffice Online advertising budget. No analysis was performed regarding whether or not this amount would achieve any particular volumes.

DECLARATION

I, Lee Garvey, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

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Dated: December 30, 1919

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

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475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 December 30, 1999